
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION
FOR ELECTRICAL SERVICE BY DA-
KOTA PLAINS AG CENTER, LLC TO
HAVE NORTHWESTERN ENERGY
ASSIGNED AS ITS ELECTRIC PRO-
VIDER IN THE SERVICE AREA OF
BONHOMME-YANKTON ELECTRIC

DOCKET NUMBER EL16-013

PETITION OF
SDREA TO INTERVENE

Pursuant to SDCL 1-26-17.1 and ARSD 20:10:01:15.02, South Dakota Rural Electric Association (“SDREA”) by its undersigned counsel files this Petition to Intervene as a party in the above-referenced matter. In support of its Petition, SDREA states as follows:

1. SDREA is an organization comprised of member electric cooperatives in South Dakota. SDREA is devoted to the protection of the interests of its member electric cooperatives and their customers.

2. Dakota Plains Ag Center, LLC (“Dakota Plains”) has filed a Petition to have NorthWestern Corporation, doing business as NorthWestern Energy, to be its electric service provider.

3. The site of Dakota Plains is located in the service territory of BonHomme-Yankton Electric Association, Inc., a rural electric cooperative and a member company of SDREA.

4. SDREA’s interests in this docket include, but are not limited to, the following:

- (a) That Dakota Plains (and future similar facilities) be required to purchase power from the electric service provider in whose ter-

ritory the facility is located, consistent with South Dakota's Territorial Laws.

(b) That Dakota Plains (and future similar facilities) be required to meet the statutory framework regarding large loads and specifically the statutory prerequisite that the proposed facility have a contracted minimum demand in excess of the statutory threshold of two thousand kilowatts. SDCL 49-34-1.5

5. SDREA believes that the issues presented in the Petition directly affect all of its member companies, and their consumers. SDREA requests that the Commission examine the Petition of Dakota Plains in this docket in a manner that does not result in an erosion of South Dakota's territorial laws, which would be detrimental to member companies and to the consumers of South Dakota.

6. The issues presented in this docket and SDREA's proposed intervention constitute matters of public interest, especially to the preservation and integrity of the South Dakota Territorial Act. Thus, denial of this Petition would be detrimental to the public interest and is likely to result in a miscarriage of justice.

WHEREFORE, SDREA requests that the Commission permit its intervention and participation in this proceeding, to examine and cross-examine witnesses, conduct discovery and offer evidence on its own behalf.

Dated this 22 day of April, 2016.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Petition to Intervene* was served via electronic filing with the South Dakota Public Utilities Commission and via email on the following individuals:

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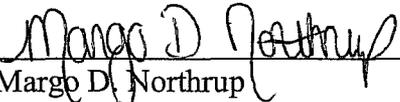
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Dated this 22 day of April, 2016.



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